

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
3467 W. Shaw Ave., Ste 100
Fresno, CA 93711
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOEL CORDERO FLORES,)	Case No. 1:24-cv-00561-KES-BAM
Plaintiff,)	STIPULATION AND PROPOSED
vs.)	ORDER FOR EXTENSION OF
)	TIME
MARTIN O'MALLEY, Commissioner)	
of Social Security ¹ ,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 1-day extension of time, from October 11, 2024 to October 15, 2024, for Plaintiff to serve on defendant with PLAINTIFF'S

¹ Martin O'Malley became the Commissioner of Social Security on December 20, 2023. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Martin O'Malley should be substituted for Kilolo Kijakazi as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's
2 Scheduling Order shall be extended accordingly.

3 This is Plaintiff's second request for an extension of time. Plaintiff
4 respectfully states that the requested extension is necessary due to current technical
5 issues that resulted in the loss of the drafted brief. Counsel's current IT is working
6 on retrieving what was lost; if unable to do so, Counsel will need additional to
7 recreate it.

8 Defendant does not oppose the requested extension. Counsel apologizes to
9 the Defendant and Court for any inconvenience this may cause.

10
11 Respectfully submitted,

12 Dated: October 11, 2024

PENA & BROMBERG, ATTORNEYS AT LAW

13
14 By: /s/ Jonathan Omar Pena
15 JONATHAN OMAR PENA
16 Attorneys for Plaintiff

17
18 Dated: October 11, 2024

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

19
20
21
22
23
24 By: */s/ Justin Lane Martin
25 Justin Lane Martin
26 Special Assistant United States Attorney
27 Attorneys for Defendant
28 (*As authorized by email on October 11, 2024)

ORDER

Pursuant to the parties' stipulation, and cause appearing, Plaintiff is granted an extension of time to October 15, 2024, to file a Motion for Summary Judgment. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: October 11, 2024

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE